

EXHIBIT C

August 5, 2022

Leslie McAdoo Gordon, Esq.
MCADOO GORDON & ASSOCIATES, P.C.
1629 K Street, N.W., Suite 300.
Washington, DC 20006
By mail and by email

Re: Lokhova v. Halper, Civil Action No. 1:20-cv-1603 (LMB) (WF)

Dear Leslie,

Please find attached a draft renewed motion to compel the production of documents. Defendant previously filed a motion to compel production of documents (Docket Entry 29), a larger group of documents, which was set for hearing last year. This year brings a new Magistrate Judge and new plaintiff counsel to this case. I have therefore narrowed the scope of the motion to compel and would file it as a renewed motion to compel. Please let me know if Plaintiff still declines to respond to, or to produce responsive documents, to this shortened list of document requests. If so, I will simply refile the motion as a renewed motion to compel to that previously calendared under Docket Entry 29. The new Magistrate may wish to address outstanding discovery issues at the pretrial conference set for August 24th, and I would like to be able to address the parties' current position on the pending motion.

Please let me know if Plaintiff stands upon her current position before Thursday, the 11th of August. If so, I will file the attached draft renewed motion, while reserving the right to make edits. Please consider this as further satisfaction of the meet and confer requirements of Local Rule 37(E). As you have requested, I am serving this by mail, but for your convenience I am also serving it by electronic mail.

Yours truly,



Terrance G. Reed